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Plaintiff's Attorney for United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TONY WILLIAMS,

Defendant.

2:14-cr-00334-RFB-VCF

STIPULATION TO CONTINUE DEADLINE
FOR GOVERNMENT'S RESPONSE TO
DEFENDANT'S MOTION TO DISMISS
INDICTMENT (Doc #109)

(Fifth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre, Acting United States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the United States of America, and Raquel Lazo, Esq., counsel for Defendant TONY WILLIAMS, that the deadline for Government's Response to Defendant's Motion to Dismiss Indictment, currently set for September 1, 2017, be vacated and continued for approximately thirty (30) days, until October 2, 2017.

This stipulation is entered for the following reasons:

1. The government needs additional time to review Defendant's Motion to Dismiss Indictment and file a response.

1 2. The parties are currently discussing negotiations regarding a non-trial disposition
2 that would obviate the need to litigate said motion.

3 3. Defense counsel needs additional time to present and discuss the potential plea
4 offer with her client.

5 4. The parties agree to the continuance.

6 5. The defendant is currently in custody and agrees to the continuance.

7 6. For the reasons stated above, the ends of justice would best be served by a
8 continuance of the deadline.

9 7. Additionally, denial of this request for continuance could result in a miscarriage
10 of justice.

11 8. The additional time requested by this Stipulation is excludable in computing the
12 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
13 United States Code, Section 3161(h)(1)(D) and 3161(h)(7) and Title 18, United States Code,
14 Section 3161(h)(7)(A) and (h)(3)(A), when considering the facts under Title 18, United States
15 Code, Sections 3161(h)(7)(B), 3161(h)(7)(B)(i), and 3161(h)(7)(B)(iv).

16 9. This is the fifth request for a continuance filed herein.
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19 _____/s/_____
20 ALEXANDRA MICHAEL
21 Assistant United States Attorney
Counsel for the United States

_____/s/_____
RAQUEL LAZO
Counsel for Defendant TONY WILLIAMS

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2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 TONY WILLIAMS,

8 Defendant.

2:14-cr-00334-RFB-VCF

ORDER CONTINUING GOVERNMENT'S
RESPONSE TO DEFENDANT'S MOTION
TO DISMISS INDICTMENT (Doc #109)

(Fifth Request)

11 **FINDING OF FACTS**

12 This stipulation is entered for the following reasons:

13 1. The government needs additional time to review Defendant's Motion to Dismiss
14 Indictment and file a response.

15 2. The parties are currently discussing negotiations regarding a non-trial disposition
16 that would obviate the need to litigate said motion.

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18 offer with her client.

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22 continuance of the deadline.

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24 of justice.

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26 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
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1 United States Code, Section 3161(h)(1)(D) and 3161(h)(7) and Title 18, United States Code,
2 Section 3161(h)(7)(A) and (h)(3)(A), when considering the facts under Title 18, United States
3 Code, Sections 3161(h)(7)(B), 3161(h)(7)(B)(i), and 3161(h)(7)(B)(iv).

4 9. This is the fifth request for a continuance filed herein.

5
6 **ORDER**

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8 Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS**
9 **HEREBY ORDERED**, that Government's Response to Defendant's Motion to Dismiss
10 Indictment, currently scheduled for September 1, 2017, be vacated and continued to October 2,
11 2017.

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13 _____
14 RICHARD F. BOULWARE, II
15 United States District Judge

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DATED: September 18, 2017.